

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN  
EASTERN DIVISION**

In re Lee David Mork, Jr.,	)	Case No. 21-20630-GMH
	)	
Debtor.	)	Chapter 13
	)	
	)	Motion to Continue Automatic Stay
	)	
	)	
	)	

**MOTION TO CONTINUE AUTOMATIC STAY**

Lee David Mork, Jr. (“Debtor”), through his counsel, Michael J. Watton and the Watton Law Group, hereby moves under 11 U.S.C. § 362(c)(3)(B) that this Court enter an order continuing the automatic stay and in support thereof alleges the following:

1. That Debtor has had one previous case under Title 11 dismissed within 1 year of the filing of this present Chapter 13 bankruptcy;
2. That since the dismissal of the previous bankruptcy, there has been a substantial change in the personal and financial affairs of the Debtor. Debtor's prior case was dismissed on January 4, 2021 for to make plan payments. Shortly before the filing of Debtor’s prior case, Debtor gained employment with Lowe’s Home Centers, LLC with a very good hourly wage. Unfortunately, after starting that job, Debtor had to care for his father, who became sick with COVID-19 and was required to quarantine himself. Because he was in a probationary period at Lowe’s, his

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employment was terminated when he missed work. Although Debtor obtained new employment with the State of Wisconsin, Department of Corrections, it was not in time to save the previous case, as his first day of work was January 4, 2021. In the present case, Debtor has obtained new employment and is about to receive his second paycheck. Debtor has sufficient income to make his plan payments and shall make them through a bi-weekly payroll deduction. Debtor has filed this case in good faith to pay for his vehicle, to pay his tax obligations, and to reorganize his debts; and

3. That Debtor declares that this present Chapter 13 bankruptcy will result in a confirmed plan which will be fully performed.

WHEREFORE, Debtor requests that the Court schedule a hearing on this motion within 30 days of the filing of this present Chapter 13 bankruptcy and issue an order continuing the automatic stay as to all creditors.

Date: February 10, 2021

/s/ Kirk M. Fedewa (for)  
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